

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

AtriCure, Inc., a Delaware corporation,)	
)	
Plaintiff,)	Case No. 1:19-cv-00054-MRB
v.)	Honorable Michael R. Barrett
Dr. Jian “Larry” Meng, an individual; Dr.)	
Guanglu Bai, an individual; and Beijing)	
Medical Scientific Co. Ltd. <i>d/b/a</i> Med-Zenith, a)	
China company,)	ORAL ARGUMENT REQUESTED
Defendants.)	

**MOTION BY DEFENDANTS DR. JIAN MENG AND MED-ZENITH
FOR AN IMMEDIATE STAY OF ALL JUDICIAL PROCEEDINGS
PENDING INTERNATIONAL ARBITRATION**

Defendants Dr. Jian “Larry” Meng (“Dr. Meng”) and Beijing Medical Scientific Co. Ltd., *d/b/a* Med-Zenith (“Med-Zenith”) (“Defendants”) hereby move for an immediate stay of all judicial proceedings pending arbitration in the People’s Republic of China. Defendants specifically request that no further proceedings take place in this action until this motion has been fully briefed and decided by the Court.

This Motion is supported by Defendants' Memorandum in Support of Their Motion for an Immediate Stay of all Judicial Proceedings Pending International Arbitration.

Date: October 8, 2019

Respectfully submitted,

SEBALY, SHILLITO & DYER

Daniel J. Donnellon (Bar No. 0036726)
James A. Dyer (Bar No. 0006824)
1900 Kettering Tower, 40 N. Main Street
Dayton, OH 45423-1013
Tel: (937) 222-2500
Fax: (937) 222-6554
Email: ddonnellon@ssdlaw.com
Email: jdyer@ssdlaw.com

PILLSBURY WINTHROP SHAW PITTMAN LLP

/s/ Mark R. Hellerer

Mark R. Hellerer (*pro hac vice*)
Geoffrey R. Sant (*pro hac vice*)
Brian L. Beckerman (*pro hac vice*)
31 West 52nd Street
New York, NY 10019
Tel. 212.858.1000
Fax. 212.858.1500
Email: mark.hellerer@pillsburylaw.com
Email: geoffrey.sant@pillsburylaw.com
Email: brian.beckerman@pillsburylaw.com

Attorneys for Defendants Dr. Jian "Larry" Meng and Beijing Medical Scientific Co. Ltd., d/b/a Med-Zenith

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2019 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and also served the same as designated below:

DLA PIPER LLP (US)

Richard A. Chesley
44 West Lake Street
Chicago, Illinois 60606-0089
Tel: 312.368.4000
Fax: 312.236.7516
richard.chesley@dlapiper.com

Mark A. Nadeau
Cameron A. Fine
Kyle T. Orne
2525 East Camelback Road Suite 1000
Phoenix, Arizona 85016-4232
Tel: 480.606.5100
Fax: 480.606.5101
mark.nadeau@dlapiper.com
cameron.fine@dlapiper.com
kyle.orne@us.dlapiper.com

Attorneys for Plaintiff AtriCure, Inc.

/s/ Mark R. Hellerer
*Attorneys for Defendants Dr. Jian "Larry"
Meng and Beijing Medical Scientific Co.
Ltd., d/b/a Med-Zenith*